

CAUSE NO. 2019-355

Bigfoot Energy Services, LLC,	§	In the District Court
<i>Plaintiff,</i>	§	
	§	
v.	§	
	§	of Panola County, Texas
Black Duck Properties, LLC, KrisJenn	§	
Ranch, LLC, KrisJenn Ranch, LLC, a	§	
Texas Limited Liability Company-Series	§	
Uvalde Ranch, and DMA Properties, Inc.,	§	
<i>Defendants.</i>	§	123rd Judicial District

DMA Properties, Inc.,	§	In the District Court
<i>Cross-Plaintiff,</i>	§	
	§	
v.	§	
	§	of Panola County, Texas
Black Duck Properties, LLC, KrisJenn	§	
Ranch, LLC, and KrisJenn Ranch, LLC, a	§	
Texas Limited Liability Company-Series	§	
Uvalde Ranch,	§	
<i>Cross-Defendants.</i>	§	123rd Judicial District

**DMA PROPERTIES, INC.'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

Cross-Plaintiff and Defendant DMA Properties, Inc. (DMA) moves for partial summary judgment against Black Duck Properties, LLC, KrisJenn Ranch, LLC, and KrisJenn Ranch, LLC, a Texas Limited Liability Company-Series Uvalde Ranch, asking the Court to recognize DMA's ownership of one-half of the note payments made by Plaintiff Bigfoot Energy Services.

**INTRODUCTION**

This case is about a business divorce and one man's illegitimate attempt to pocket the separate property that, under the agreement dividing up company assets, belongs to his former business partner.

Cause No. 19CV34877

Longbranch Energy, LP,	§	In the District Court
<i>Plaintiff,</i>	§	
	§	
	§	
v.	§	
	§	123rd/273rd Judicial District
	§	
TCRG East Texas Pipeline 1, LLC, Black	§	
Duck Properties, LLC, DMA Properties,	§	
Inc., Larry Wright, and KrisJenn Ranch,	§	
LLC,	§	
<i>Defendants.</i>	§	Shelby County, Texas

DMA Properties, Inc.,	§	In the District Court
<i>Cross-Plaintiff/Third Party Plaintiff,</i>	§	
	§	
	§	
v.	§	
	§	
TCRG East Texas Pipeline 1, LLC, Black	§	
Duck Properties, LLC, Larry Wright,	§	123rd/273rd Judicial District
KrisJenn Ranch, LLC, KrisJenn Ranch,	§	
LLC-Series Uvalde Ranch, John Terrill.	§	
	§	
<i>Cross-Defendants/Third-Party</i>	§	
<i>Defendants.</i>	§	
	§	
	§	Shelby County, Texas

**MOTION TO COMPEL LARRY WRIGHT, KRISJENN RANCH, LLC, AND  
BLACK DUCK, LLC TO RESPOND TO DISCOVERY**

DMA Properties and Frank Daniel Moore (collectively, “Moore”) file this motion to compel discovery responses from Larry Wright, KrisJenn Ranch, LLC, and Black Duck Properties, LLC (collectively, “the Wright Parties”). This motion to compel is necessary because the Wright Parties refuse to substantively respond to any of Moore’s discovery requests.

Cause No. 19CV35048

Larry M. Wright, KrisJenn Ranch, LLC, and KrisJenn Ranch, LLC-Series Uvalde Ranch, as successors to Black Duck Properties, LLC,	§ § § §	In the District Court
<i>Plaintiffs,</i>	§ § §	
v.	§ § §	123rd Judicial District
Frank Daniel Moore, DMA Properties, Inc., Darin Borders, and Longbranch Energy, LP,	§ § §	
<i>Defendants.</i>		Shelby County, Texas

**DMA PROPERTIES AND FRANK DANIEL MOORE’S PLEA IN ABATEMENT  
AND, IN THE ALTERNATIVE, MOTION TO CONSOLIDATE**

DMA Properties and Frank Daniel Moore (collectively, “Moore”) request the Court abate this action because Plaintiffs have failed to join a necessary party. Alternatively, Moore asks that the Court remedy the party defect by consolidating this action with *Longbranch Energy, LP et al. v. TCRG et al.*, 19CV34877, which includes all necessary parties.

## BACKGROUND

**I. The parties' dispute centers on ownership of a pipeline right-of-way.**

This dispute concerns the parties' interests in a pipeline right-of-way. In 2015, Daniel Moore and Darin Borders secured the right to purchase a right-of-way running through Shelby County for \$5 million. When Larry Wright learned of the right-of-way deal, he begged to be a part of it. Moore and Borders agreed to let Wright join the deal, and Wright promised to provide funding through Black Duck Properties, LLC. At the time, Black Duck was jointly owned by Moore and Wright through their respective entities, SCMED Oilfield Consulting, LLC and KrisJenn Ranch, LLC.